

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Alabama

United States of America

v.

GERALD LITTLE

Case No. 2:21mj82-SMD

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 26, 2021 in the county of Lowndes in the
Middle District of Alabama, the defendant(s) violated:

Code Section

18 USC 922(g)(1)

Offense Description

FELON IN POSSESSION

This criminal complaint is based on these facts:

SEE ATTACHMENT A

☒ Continued on the attached sheet.

Complainant's signature

RICHARD K. MADDOX, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/01/2021

*Judge's signature*City and state: Montgomery, Alabama

STEPHEN M. DOYLE, CHIEF U.S. MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

I, Richard K. Maddox, being duly sworn, state the following:

Introduction and Agent Background

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a warrant.
2. I have been employed as a Special Agent with ATF since July 2013. I am a graduate of the Federal Law Enforcement Training Center and the ATF National Academy. I am currently assigned to the Montgomery Field Office. Prior to my employment with ATF, I was employed as a Police Officer with the Hoover, Alabama, Police Department for seven years. I was assigned as a Detective in the Crimes Against Property Unit for two (2) years and worked patrol for five (5) years. I was also assigned to the Special Response Team (SWAT Unit) for four (4) years. I received my bachelor’s degree in Criminal Justice from the University of Alabama at Birmingham.
3. As an ATF Special Agent I investigate violations of Federal Firearms Laws under Title 18 and Title 26 of the United States Code. I have also been involved in various types of investigations involving the use of electronic surveillance, debriefing of defendants, witnesses, informants, and others who have knowledge of firearms violations. I have participated in investigations resulting in the arrest of prohibited persons in possession of firearms, firearms trafficking suspects and in the seizure of numerous unlawfully possessed firearms.

4. The information in the Affidavit is based on my personal involvement in the investigation of this case; law enforcement reports, records, and interviews; information received from other law enforcement agents; my experience and training; and the experience of other agents. This affidavit specifically sets forth the facts necessary to establish probable cause, and therefore it does not contain every fact known to me or other law enforcement officers about the investigation.

Probable Cause

5. On June 26, 2021, in Fort Deposit, Alabama, within the Middle District of Alabama, Fort Deposit Police Officers responded to the sound of multiple gunshots coming from the area of Gilmer Hill Road. Fort Deposit Police Chief Steiner and Sgt. Johnson responded to the area. When they arrived, they saw a group of people attending a funeral, several of whom appeared to have been shot. Several witnesses told the officers that the shooter was a black male travelling in a white SUV.
6. Some of the witnesses identified the shooter as Gerald LITTLE. The witnesses stated that while the funeral was taking place, LITTLE was playing loud, disruptive music from a vehicle nearby. The witnesses stated that several funeral attenders, including Jerry Gipson, approached LITTLE and asked LITTLE to turn down the music. LITTLE refused, became very angry, and began to curse and threaten the funeral attenders who had approached him. According to witnesses, a female with LITTLE produced a handgun, which LITTLE took from her. LITTLE fired the handgun into the crowd, shooting at least four people, killing Gipson. Gipson was pronounced dead on the scene and four other victims were transported to area hospitals with gunshot wounds.

7. Fort Deposit Police recovered four (4) shell casing from the scene and took them into evidence. On June 28, 2021, ATF Taskforce Officer Antonio Goins took the shell casings from Fort Deposit to Montgomery to enter them into the National Integrated Ballistics Identification Network. On June 30, 2021, your affiant discussed these shell casings with ATF Senior Special Agent (SSA) Stephen Thompson, a qualified Interstate Nexus Expert. The shell casings are brass casings with the engraving WIN 9mm LUGER on the head stamp of each. Based on SSA Thompson's experience and training, he gave the opinion that the ammunition was not manufactured in the state of Alabama, and therefore must have traveled in interstate commerce in order to have been found in Alabama. The shell casings have been returned to the Fort Deposit Police Department to retain as evidence.
8. On June 29, 2021, your affiant reviewed LITTLE's criminal history and found the following convictions:
 - a. Circuit Court of Lowndes County, Alabama, Docket Number: 45-CC-98-000134: Assault First Degree
 - b. Circuit Court of Lowndes County, Alabama, Docket Number: 45-CC-2001-000009: Theft of Property 1st
 - c. Circuit Court of Lowndes County, Alabama, Docket Number: 45-CC-2001-000013: Theft of Property 1st
 - d. Circuit Court of Elmore County, Alabama, Docket Number: CC-15-119: Theft of Property 1st Degree
 - e. Circuit Court of Montgomery, County, Alabama, Docket Number: 03-CC-2015-001371: Burglary 3rd Degree

Each of these convictions is a felony, that is, an offense punishable by more than one year in prison. Documentation supporting these convictions shows that on November 2, 1998, LITTLE signed an Explanation of Rights and Guilty Plea form for Lowndes County

Circuit Court, Docket Number 45-CC-98-000134, in which he acknowledged that he was a convicted felon.

9. Based on the foregoing facts, there is probable cause to believe that on June 26, 2021, Gerald Little, knowing that he was a convicted felon, knowingly possessed ammunition that had travelled in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1). This violation occurred within Lowndes County, in the Middle District of Alabama. Therefore, I respectfully request the issuance of an arrest warrant for Gerald LITTLE for violation of Title 18, United States Code, Section 922(g)(1).

Respectfully Submitted,



Richard K. Maddox
Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives (ATF)

Subscribed electronically and sworn to telephonically before
me on the 1st day of July, 2021.



Honorable Stephen M. Doyle
Chief United States Magistrate Judge